

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

TRUSTEES OF THE PLUMBERS AND  
PIPEFITTERS NATIONAL PENSION FUND,

Plaintiffs,

V.

MCREYNOLDS PROCESS PIPING AND  
PLUMBING, LLC,

Defendant.

) CIVIL ACTION NO. 1:21-cv-140  
) TSE-MSN

### DECLARATION OF JOHN R. HARNEY FOR ENTRY OF DEFAULT

I, John R. Harney, Esquire, hereby certify, declare and verify under penalty of perjury, and pursuant to 28 U.S.C. § 1746 this 20<sup>th</sup> day of July, 2021, and state the following:

1. I am the attorney for the Plaintiffs in the above-entitled action.
2. The Complaint was filed on February 8, 2021 (Docket #1) and Summons was issued on February 9, 2021 (Docket #4). The Complaint and Summons were served on April 14, 2021 on Defendant, McReynolds Process Piping and Plumbing, LLC by serving James D. McReynolds, Member and Registered Agent of Defendant Company, at 8155 Old Buffalo Road, Gracey, Kentucky 42232 as indicated in the Proof of Service of the Complaint and Summons that has been duly docketed with the Court (Docket #5).
3. No answer has been filed and Defendant has not otherwise moved or extended time. The time in which the Defendant may answer or otherwise move as to the Complaint has expired.
4. Defendant is neither an infant nor incompetent individual.

5. Inasmuch as the Defendant is a corporation it is not in the military service.
6. The Clerk is requested to entered default against the Defendant.
7. A proposed Entry of Default is attached.

By: \_\_\_\_\_/s/\_\_\_\_\_  
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